

JOINT PROPOSED PRETRIAL ORDER

Pulliam v. County of Fort Bend, Texas, et al.

Case No. 4:22-cv-4210

ATTACHMENT C

Pulliam's Exhibit List

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JUSTIN PULLIAM,

Plaintiff,

v.

Civil Action No. 4:22-cv-4210

COUNTY OF FORT BEND, TEXAS;
SHERIFF ERIC FAGAN, in his
individual capacity; OFFICER ROBERT
HARTFIELD, in his individual capacity;
OFFICER JONATHAN GARCIA, in his
individual capacity; OFFICER TAYLOR
ROLLINS, in his individual capacity;
and OFFICER RICKY RODRIGUEZ, in
his individual capacity,

Defendants.

PLAINTIFF'S EXHIBIT LIST

| No. | Description | Offer | Obj. | Admit | Date |
|------------|--|--------------|-------------|--------------|-------------|
| PX 1 | Photo of Kraft Property with Rodriguez Notes | | | | |
| PX 2 | Photo of Kraft Property with Tractor Trailer | | | | |
| PX 3 | Photo of Kraft Property | | | | |
| PX 4 | Photo of Vantage Point from Across the Street | | | | |
| PX 5 | Kraft Property Photos, February 14, 2023 | | | | |
| PX 6 | Probable Cause Affidavit, Sergeant Taylor Rollins, December 21, 2021 | | | | |

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|-------|--|-------|------|-------|------|
| PX 7 | Jail Video, December 21, 2021 | | | | |
| PX 8 | FBCSO Officer Cardenas Facebook Post | | | | |
| PX 9 | Criminal Case Warrant Info Sheet and Presentation Packet, January 4, 2022 | | | | |
| PX 10 | Corruption Report Video, May 5, 2022 | | | | |
| PX 11 | Criminal Case Presentation Sheet, April 13, 2022 | | | | |
| PX 12 | Fort Bend County Interference with Public Duties Arrests 2020-2022, Redacted Offense Reports | | | | |
| PX 13 | Fort Bend County Interference with Public Duties Arrests 2020-2022, Summaries | | | | |
| PX 14 | Pulliam Email with Fwd, January 12, 2021 | | | | |
| PX 15 | Video of Press Conference, July 12, 2021 | | | | |
| PX 16 | Sheriff Eric Fagan's Campaign Video | | | | |
| PX 17 | Video of October 2, 2023 Interaction with FBSCO | | | | |
| PX 18 | Video of October 15, 2024 Interaction with FBSCO | | | | |
| PX 19 | Video of April 3, 2020 Interaction with HCCO | | | | |
| PX 20 | Pulliam Arrest Sync Video, December 21, 2021 | | | | |
| PX 21 | AG Determination Letter Fort Bend County SO (Fagan Middleton Communications), October 18, 2023 | | | | |

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|-------|--|-------|------|-------|------|
| PX 22 | Pulliam Open Records Request (Fagan Middleton Communications), November 17, 2022 | | | | |
| PX 23 | Fort Bend County SO Open Records Response (Fagan Middleton Communications), March 17, 2023 | | | | |
| PX 24 | Fagan Middleton Text Conversations | | | | |
| PX 25 | AG Determination Letter Fort Bend County SO (Command Staff Emails), August 28, 2024 | | | | |
| PX 26 | AG Determination Letter Fort Bend County SO (Pulliam Docs), August 28, 2024 | | | | |
| PX 27 | Total Damages Summary | | | | |
| PX 28 | Anti-Pulliam Social Media Posts | | | | |
| PX 29 | Grand Jury Indicts Local YouTube Activist, Fort Bend Herald | | | | |
| PX 30 | Truthfinder Report on Justin Pulliam | | | | |
| PX 31 | Letter Suspending License to Carry a Handgun, January 10, 2023 | | | | |
| PX 32 | Safety and Data Security Expense Receipts and Records | | | | |
| PX 33 | Equipment Replacement Expense Receipts and Records | | | | |
| PX 34 | Criminal Case Expense Receipts and Records | | | | |
| PX 35 | Summary of Expenses Related to December 21, 2021 Arrest | | | | |
| PX 36 | Corruption Report Video YouTube Lifetime Revenue Example | | | | |

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|-------|---|-------|------|-------|------|
| PX 37 | Charts of Police Events Filmed 2021-2025 | | | | |
| PX 38 | Corruption Report Videos, YouTube Raw Data Download | | | | |
| PX 39 | Corruption Report Uploads, YouTube Data Formatted List | | | | |
| PX 40 | Corruption Report Excluded Videos, YouTube Data Formatted List | | | | |
| PX 41 | Business Damages to YouTube Platform Revenue | | | | |
| PX 42 | Justin Pulliam Live Revenue Per Month Graph | | | | |
| PX 43 | Justin Pulliam Live Revenue, YouTube Raw Data Download | | | | |
| PX 44 | Corruption Report Livestreams, YouTube Data Formatted List | | | | |
| PX 45 | Livestreams Revenue, YouTube Data Summary | | | | |
| PX 46 | Defendant Fort Bend County's Response to Plaintiff's First Set of Requests for Admission, July 28, 2023 | | | | |
| PX 47 | Defendant Eric Fagen's Response to Plaintiff's First Set of Requests for Admission, July 28, 2023 | | | | |
| PX 48 | Transcript of the 30(b)(6) Deposition of Fort Bend County, August 29, 2023 | | | | |
| PX 49 | Transcript of the Deposition of Sheriff Eric Fagan, August 9, 2023 | | | | |
| PX 50 | Photo of Pulliam Filming, October 15, 2024 | | | | |
| PX 51 | Video from Pulliam Dashcam, December 21, 2021 | | | | |

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| PX 52 | Video from Handheld Camera with Subtitles, December 21, 2021 | | | | |
| PX 53 | Video from Deputy Rodriguez's Dashcam, December 21, 2021 | | | | |
| PX 54 | Offense Report, December 21, 2021 | | | | |
| PX 55 | Call Slip, December 21, 2021 | | | | |
| PX 56 | Call Slip, December 21, 2021 (Partially Redacted, Open Records) | | | | |
| PX 57 | Call Slip, December 21, 2021 | | | | |
| PX 58 | Grand Jury Indictment, May 16, 2022 | | | | |
| PX 59 | Grand Jury Indictment, August 10, 2022 | | | | |
| PX 60 | Notice of Resetting Arraignment, March 15, 2022 | | | | |
| PX 61 | Notice of Resetting Arraignment, May 4, 2022 | | | | |
| PX 62 | Records for Transfer of Criminal Case | | | | |
| PX 63 | Dismissal of Criminal Case, May 15, 2024 | | | | |
| PX 64 | Detective Travis James Search Warrant Affidavit A, January 14, 2022 | | | | |
| PX 65 | Detective Travis James Search Warrant Affidavit B, January 14, 2022 | | | | |
| PX 66 | Texas Penal Code Section 38.1 | | | | |

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| PX 67 | FBCSO General Order #05-04 Social Media and Related Communications, Jun. 1, 2017 | | | | |
| PX 68 | FBCSO General Order #05-04 Social Media and Related Communications, Oct. 1, 2021 | | | | |
| PX 69 | FBCSO General Order #08-03 Public Information and Media Relations, Jun. 1, 2017 | | | | |
| PX 70 | FBCSO General Order #08-03 Public Information and Media Relations, Oct. 1, 2021 | | | | |
| PX 71 | FBCSO General Order #08-03 Public Information and Media Relations, Dec. 29, 2022 | | | | |

Dated: July 1, 2025.

Respectfully submitted,

/s/ Christen Mason Hebert

Christen Mason Hebert, Attorney-in-Charge
Texas Bar No. 24099898
Federal ID No. 3844981

Jeffrey Rows*, of counsel
Texas Bar No. 24104956

Michael Peña*, of counsel
Texas Bar No. 24131580

INSTITUTE FOR JUSTICE
816 Congress Ave., Suite 970
Austin, TX 78701
(512) 480-5936
chebert@ij.org
jrowes@ij.org
mpena@ij.org

*Admitted *pro hac vice*

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2025, a true and correct copy of the foregoing document was served upon all counsel of record.

/s/ Christen Mason Hebert
Christen Mason Hebert, Attorney-in-Charge

Attorney for Plaintiff